

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Norma Edith SIMPSON

Case No. 7:25-mj-1549

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 7, 2025 in the county of Hidalgo in the Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 United States Code § 545

Did knowingly import into the US Merchandise contrary to law to whit twenty (20) yellow-headed amazon parrots utilising a method of concealment.

16 United States Code § 1538

Unlawfully imported and transported ESA protected and CITES regulated wildlife to whit twenty (20) yellow-headed amazon parrots.

16 United States Code § 3372

Unlawfully imported twenty (20) yellow-headed amazon parrots in violation of 18 USC 545 and international law (CITES).

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

United States Courts
Southern District of Texas
FILED

July 07, 2025

Nathan Ochsner, Clerk of Court

☒ Continued on the attached sheet.

S/ Efren CHavez

Complainant's signature

Efren Chavez, USFWS Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/07/2025 @ 7:13 p.m.

City and state: McAllen, Texas


Judge's signature

U.S. Magistrate Judge Juan F. Alanis

Printed name and title

Attachment A

1. On July 7, 2025, Norma Edith SIMPSON was traveling from the Republic of Mexico to the United States via the vehicle lane at the Hidalgo Port of Entry in Hidalgo, Texas. During the inspection, SIMPSON provided a negative customs declaration to a US Customs and Border Protection Officer (CBPO). SIMPSON was referred to vehicle secondary inspection.
2. While the vehicle was searched at secondary inspection, a CBPO discovered a bag inside the vehicle. The bag was concealed underneath a third-row seat, which was covered by clothes and toys. The CBPO opened the bag and discovered twenty (20) yellow-headed amazon parrots.
3. U.S. Fish and Wildlife Service (USFWS) and Homeland Security Investigations (HSI) Special Agents (SAs) conducted an interview with SIMPSON. During the post Miranda interview, SIMPSON stated that she bought the parrots from her uncle's friend in Mexico and was bringing them to the United States to sell on Facebook Marketplace. SIMPSON admitted to not declaring the parrots upon entry to both officers.
4. Simpson refused permission to search her phone, stating that it contained photos from an incarcerated relative and she did not want to be implicated in that relative's criminal activity.
5. Simpson refused to provide agents with her home address or any kind of identification apart from a birth certificate. Nor would she vouch for the veracity of the telephone number she provided.
6. Yellow-headed amazon parrots are protected under the Endangered Species Act (ESA) 16 USC 1538. Additionally, their importation is regulated by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) 50 CFR 23. To legally import a yellow-headed amazon parrot, one must possess a CITES permit and license to do so from the US Fish and Wildlife Service. SIMPSON does not possess a CITES permit.
7. Additionally, anyone selling or transporting yellow-headed amazon parrots, for commercial purposes must be licensed by the US Department of Agriculture (USDA) to legally do so. SIMPSON does not possess a USDA license to transport or sell yellow-headed amazon parrots.
8. SIMPSON failed to follow the provisions of 50 CRF 14 and 23 and subsequently violated 18 USC 545 smuggling goods into the United States. Additionally, the transport and importation of wildlife into the United States is violation of 16 USC 3372 (Lacey Act).